

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent Steve Worthy, being first duly sworn, hereby depose and state as follows:

**Introduction and Agent Background**

Your affiant, Special Agent (SA) Steve Worthy Jr., is a Criminal Investigator with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Clarksburg Field Office, and has been so employed since January 2016. Additionally, your affiant holds a Bachelor of Arts degree from the University of South Carolina. Previous experience includes five years as a Federal Air Marshal in the Atlanta Field Office and approximately six years as a State Trooper with the South Carolina Highway Patrol. Your affiant has received over 1,000 hours of law enforcement training at the Federal Law Enforcement Training Center and the ATF National Academy. Your affiant has received extensive training, both formal and on-the-job, in the provisions of the Federal Firearms Laws administered under Title 18 and Title 26, U.S. Code and Federal Narcotics Laws administered under Title 21, U.S. Code.


**Probable Cause Supporting the Criminal Complaint**

1. The information contained in this affidavit is based upon the information I have gained from my investigation, my experience and my training, and/or information relayed to me by other law enforcement agents and/or their experience and training. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth the facts that I believe are necessary to establish probable cause.
2. Your Affiant is currently investigating the following individual: Robert Michael JUNKINS.
3. On 30 November 2018, Officer Sayre with the Elkins City Police Department (EPD) conducted a traffic stop on a vehicle being operated by Robert Michael JUNKINS. As JUNKINS exited the vehicle, officers noticed drug paraphernalia on the driver's side floorboard and suspected methamphetamine in a vial around JUNKINS' neck. During a search of the vehicle, officers located a Smith and Wesson, M&P 9C, 9mm caliber pistol, serial # HBK1248, underneath the driver's seat where JUNKINS had been seated.
4. During a recorded interview of JUNKINS, conducted by Task Force Officers (TFO) with the Mountain Region Drug Task Force (MRDTF), JUNKINS claimed ownership of the firearm recovered by officers from inside the vehicle.
5. Your Affiant knows JUNKINS has a prior felony conviction in United States District Court in the Northern District of West Virginia for aiding and abetting in the distribution of cocaine base, Title 21 U.S.C. § 841(a)(1), 841(b)(1)(C) in May 2006. The criminal case number is 1:05CR099-001.
6. JUNKINS' possession of a firearm on 30 November 2018 is a direct violation of Title 18 U.S.C. § 922(g)(1) – Possession of a firearm by a prohibited person (Felon).

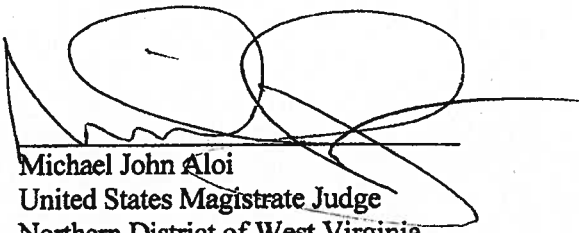
7. The firearm has been found to affect interstate commerce by Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Special Agent (SA) and Interstate Nexus expert Matthew Kocher.

**Oath**

The information in this affidavit is true to the best of my knowledge and belief.

  
Steve Worthy Jr.  
Special Agent,  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to and Subscribed before me on Nov. 30 2018.

  
Michael John Alo  
United States Magistrate Judge  
Northern District of West Virginia

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